

**CALIFORNIA TECHNOLOGY AGENCY**

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Carlos Ramos
Secretary of California Technology

March 11, 2013

Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**RE: CALIFORNIA 9-1-1 EMERGENCY COMMUNICATIONS DIVISION COMMENTS FOR OTHER
SECTIONS ON FURTHER NOTICE OF PROPOSED RULEMAKING**

In the Matter of "Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications", PS Docket No. 11-153; and "Framework for Next Generation 911 Deployment, PS Docket No. 10-255",

Dear Ms. Dortch:

The Public Safety Communication Office supports the Federal Communications Commission's (FCC) stand on the importance and benefits of developing regulations that will support Text-to-9-1-1 services to be used throughout the country. The State of California agrees with the FCC that individuals who are deaf, deaf-blind, hard of hearing or have speech disabilities, as well as, the general public will benefit substantially from having access to emergency services via text message. While California agrees that there is a need to make progress on Text-to-9-1-1, we also realize the need of Public Safety Answering Point readiness to address the operational procedures and training which we see are critical steps toward providing adequate Text-to-9-1-1 services.

Following the FCC's goal to rapidly adopt Text-to-9-1-1, California plans to establish a leadership position toward this technology and to this end, released a Request for Information (RFI) on February 5, 2013. Through the RFI, California is currently gathering information on possible timelines and technical options for implementation of Text-to-9-1-1. The State is also aggressively examining any Text-to-9-1-1 delivery method that may be available for use or in development which can be made available in the marketplace in conjunction with the May 15, 2014 deadline set by the FCC for the four major carriers to have availability of an interim service for deployment.

The State applauds the FCC's intention to make "bounce back" messages mandatory for inbound SMS messages to 9-1-1 (which indicate that the service is not available, and instructs the caller to make a voice call to 9-1-1) by all carriers as of June 30, 2013. The Public Safety Communications Office's Text-to-9-1-1 RFI also includes a requirement that any solution(s) submitted be accessible by using the short code "9-1-1" to send SMS text messages. Systems requiring the use of other digit strings will be viewed as ineffective.

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The State believes by gathering this information, along with other information including technical issues, cost and call authentication will allow us to be in a better position to meet any proposed requirements and/or regulations set forth by the Commission in the future.

Respectfully Submitted,



KAREN WONG, Director
Public Safety Communications Office

cc: Ryan Dulin, Deputy Director, Public Safety Communications Office, CA 9-1-1 Division